

MEMO ENDORSED

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February 9, 2024

**VIA ECF AND EMAIL**

Honorable Andrew L. Carter, Jr.  
United States District Judge  
Southern District of New York  
40 Foley Square, Room 435  
New York, New York 10007  
[ALCarterNYSDChambers@nysd.uscourts.gov](mailto:ALCarterNYSDChambers@nysd.uscourts.gov)

RE: *Kee v. The Detroit Lions, Inc. et al.*, No. 1:24-cv-00223-ALC (S.D.N.Y.)  
**Consented Motion for Extension of Time to Respond to Complaint**

Dear Judge Carter:

We represent Defendants NFL Properties LLC and NFL Enterprises LLC (the “NFL Parties”), and write jointly on behalf of (1) the NFL Parties and co-Defendants (2) The Detroit Lions, Inc., (3) Getty Images (US) Inc., (4) Fanatics Retail Group North, LLC, (5) Bullion International, Inc. d/b/a The Highland Mint, and (6) McFarlane Toys, Inc. (collectively, “Defendants”) in connection with the above-referenced matter.

As reflected by the Affidavits of Service filed by Plaintiff (ECF 29-35), the Complaint has been served on the Defendants on dates between January 23 and February 2. Accordingly, the first responses to the Complaint (by the NFL Parties and Fanatics Retail Group North, LLC) are due on February 13.

The above-listed Defendants have coordinated with Plaintiff, and all parties have consented to an extension of Defendants’ time to respond to the Complaint to **Friday, March 22, 2024**. The parties respectfully request that the Court enter an order permitting the Defendants to answer or otherwise

respond to the Complaint by that date. No prior requests for an extension have been made by any party.

The Parties thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ Jordan A. Feirman

Jordan A. Feirman

cc (by ECF and/or email):

Counsel for Plaintiff:

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Counsel for The Detroit Lions, Inc.:

Susan Kornfield & Justin Bagdady, Bodman PLC

Counsel for Getty Images (US) Inc.:

James Rosenfeld and Nimra Azmi, Davis Wright Tremaine LLP

Counsel for Fanatics Retail Group North, LLC:

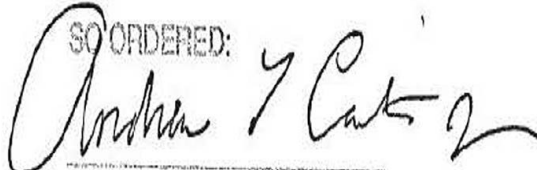
Rob Potter, Kilpatrick Townsend & Stockton LLP

Counsel for Bullion International, Inc. d/b/a The Highland Mint:

Craig Miller, Lathrop GPM

Counsel for McFarlane Toys, Inc.:

Jura Zibas & Stephen Barrett, Wilson Elser

SO ORDERED:  
  
HON. ANDREW L. CARTER, JR.  
UNITED STATES DISTRICT JUDGE

Dated: February 12, 2024